

David R. Flyer, Bar #100697  
Raquel Flyer Dachner, Bar #282248  
**FLYER & FLYER, A Professional Law Corporation**  
4120 Birch St., Ste. 101  
Newport Beach, CA 92660  
(949) 622-8445  
(949) 622-8448 (fax)  
davidflyer@flyerandflyer.com  
raquelflyer@flyerandflyer.com

Attorneys for Defendants  
ABDULLAH LIMITED COMPANY,  
BINOTECH LLC, and HIK TECH LLC

IN THE UNITED STATES DISTRICT COURT FOR  
THE CENTRAL DISTRICT OF CALIFORNIA

JOANNA ARDALAN, ESQ, an  
individual; ONE LLP, a California Limited  
Liability Partnership,

Plaintiffs,

vs.

BINOTECH LLC; KAREN MUMMERT;  
MICHAEL MUMMERT; ABDULLAH  
LIMITED COMPANY; CODERS CUBE  
LLC; HIK TECH LLC; DATA PATCH,  
INC.; DOE 1, d.b.a. LAW INTEGRAL,  
LLC, business entity unknown; DOE 2,  
d.b.a. DEPUTY TRADEMARK, business  
entity unknown; DOE 3, p.k.a.  
MICHELLE SPRAGUE, an individual;  
DOE 4, d.b.a. TRADEMARK INTEGRAL,  
business entity unknown; DOE 5, d.b.a.  
BRANDREGISTRATION.ORG, business  
entity unknown; and DOES 6 through 10,  
inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-DFM

**DECLARATION OF DAVID R.  
FLYER IN SUPPORT OF  
MOTION TO SET ASIDE  
DEFAULT OF ABDULLAH  
LIMITED COMPANY,  
BINOTECH LLC, and HIK TECH  
LLC (FRCP 55(c))**  
[Doc. 50]

U.S. District Judge:  
Kenly Kiya Kato  
U.S. Magistrate Judge:  
Douglas F. McCormick

Courtroom: 3  
3470 12th Street, Riverside,  
California 92501

Complaint filed: July 12, 2023  
Default taken: October 25, 2024

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS:

I, David R. Flyer, declare:

1. I have personal knowledge of the underlying, by virtue of being an  
attorney, duly licensed to practice law before all the federal and state courts in

1 California. I am attorney for Defendants ABDULLAH LIMITED COMPANY,  
2 BINOTECH LLC, and HIK TECH LLC herein. I could and would competently  
3 testify under oath in a court of law to the following if called upon to do so.

4 Attached to this filing at Exhibit "8" is a true and correct copy of the proposed  
5 answer to complaint of Defendants ABDULLAH LIMITED COMPANY,  
6 BINOTECH LLC, and HIK TECH LLC.

7 I declare, under penalty of perjury under the laws of the United States of  
8 America, that the foregoing is true and correct and executed at Newport Beach,  
9 California, on November 25, 2024.

10  
11 /s/ David R. Flyer  
David R. Flyer